



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**



# Office of Child Care COVID-19 CCDF Administrators Call

March 18, 2020



# Welcome & Update from OCC Leadership

- Director, Shannon Christian
- Deputy, Ellen Wheatley
- Division Directors
  - Andrew Williams, Policy
  - Dawn Ramsburg, Program Operations
  - Moniquin Huggins, Oversight & Accountability
  - Ginny Gipp, Technical Assistance
  - Richard Gonzales, PDG B-5, Collaborative Grants

# Government's Role COVID-19

## **Federal Role**

- CDC – Resources and Guidance on Public Health Concerns
- OCC – CCDF Policy
- Congress – Funding

## **State and Local Role Tribal Government**

- Local Public Health Agencies – Tracking and Decisions at Local Level
- State / CCDF Policy – Statewide Decisions
- State Funding/Legislature

# Federal Public Health Resources

- Coronavirus.gov -- The Centers for Disease Control and Prevention (CDC) provides up-to-date information about prevention, symptoms, and testing.
- CDC issued guidance to help administrators of public and private child care programs and K-12 schools to prevent the spread of COVID-19 among children and staff.

# CCDF Resources

- CCDF Guidance on Existing Flexibility in Spending CCDF Funds in Response to Emergency Situations
- Information Memorandum CCDF-ACF-IM-2017-02, November 27,2017
- [www.acf.hhs.gov/occ/resource/im-2017-02](http://www.acf.hhs.gov/occ/resource/im-2017-02)
- OCC Website: COVID-19 Resources for CCDF Programs and Policymakers
- <https://www.acf.hhs.gov/occ/resource/occ-covid-19-resources>

# Child Care Policy Goals

## *What we've heard...*

- **Maintain child care revenue** during closures and/or service reduction to retain child care supply—for both programs and staff (businesses and people who work there)
- **Provide child care services**
  - **to existing CCDF families** as needed
  - **to new families** – regardless of current CCDF status, e.g.,
    - Health workers and emergency responders
    - Parents working while schools are closed
- **Keep children healthy** -- *consider settings and practices that prevent spread of COVID-19*

# Flexibility in Spending CCDF Funds in Response to Federal or State Declared Emergency Situations

- In some cases, States may need to enact State legislation or regulation in order to take advantage of these flexibilities. They also may need to submit a Plan amendment or waiver request to OCC. **Please contact the RO for guidance prior to submitting these requests to determine if waiver, Plan Amendment or both is needed.**



# Flexibility: Quality \$

## **Use Quality Dollars to Improve/Maintain Quality and Supply**

- Can be awarded to child care providers regardless of whether they serve CCDF eligible children
- Requires a Waiver? No
- Requires a Plan Amendment? Maybe, depends on current Plan



# Flexibility: Provider Payment Practices

## **Change Provider Payment Practices for Subsidies**

- Pay based on enrollment rather than attendance
- Provide more generous absence day policies
- Requires a Waiver? No
- Requires a Plan Amendment? Yes, in most cases

# Flexibility: Eligibility Criteria & Priority Rules

## **Change CCDF Eligibility Criteria and/or Priority Rules for Children/Families**

- Define “Working” to include families seeking employment, participating in community service, or a similar activity
- Raise income eligibility threshold and/or change what counts as income
- Establish new priority rules (e.g., children of health care and emergency workers)
- Requires a Waiver? No, as long as income is below 85% of State Median Income, and parent is “working,” or attending education/training, or child is in need of protective services
- Requires a Plan Amendment? Yes, in most cases

# Flexibility: Protective Services

## **Broaden the Lead Agency's Definition of Protective Services**

- Deem certain children impacted by COVID-19 circumstances to be in need of protective services (e.g., children of health care and emergency workers)
- Reminder:
  - Lead Agencies may waive income eligibility for protective services on a case-by-case basis
  - Protective services cases do not require the parent to be working, or to attend training/education
- Requires a Waiver? No
- Requires a Plan Amendment? Maybe, depends on current Plan

# Flexibility: Eligibility Redetermination

## **Change Eligibility Redetermination Policies**

- Lengthen minimum 12-month eligibility to a longer period
- Lengthen minimum 3-month period of continued assistance (job search) to a longer period
- Requires a Waiver? No
- Requires a Plan Amendment? Yes, in most cases

# Flexibility: Co-Payments

## **Waive or Reduce Co-Payments for Impacted Families**

- Waive co-pay requirements for families that meet criteria established by the Lead Agency
  - Requires a Waiver? No, as long as co-pays are waived for a sub-population (e.g., health care and emergency workers) and not all families
  - Requires a Plan Amendment? Maybe, depends on current Plan
- Revise sliding fee schedule to reduce co-pays for some or all families
  - Requires a Waiver? No
  - Requires a Plan Amendment? Yes

# So, What Policy Changes Would Require a Waiver?

- Health and Safety Requirements
- Health and Safety Training
- Background Checks
- Annual Inspections
- Eligibility above 85% SMI (if opting not to use other strategies, such as protective services designation)

Note – there are potential interactions with existing waivers

# Guidance on Submitting Waivers

- Lead Agency must submit a written request to the Office of Child Care (OCC) Director via email with a copy to the OCC Regional Program Manager.
- Waiver requests are limited to an initial period of no more than two years from the date of approval, and at most, an additional one-year renewal from the date of approval of the extension.
- **Upon approval of a waiver request**, Lead Agencies have 60 days to submit a CCDF Plan amendment to correspond with the provision(s) in the waiver request.

# Guidance on Submitting Waivers

- Waiver Request must include:
  1. Reason why the Lead Agency is requesting the waiver including a description of the extraordinary circumstances.
  2. Sufficient detail on the provision(s) from which the Lead Agency is seeking temporary relief and how relief from the sanction or provision, by itself, will improve the delivery of child care services for children and families,
  3. Certify and describe how the health, safety, and well-being of children served through CCDF will not be compromised as a result of the waiver; and
  4. Preferred start date (which may be retroactive to the time the emergency occurred) and the duration of the waiver.



# **CCDF Frequently Asked Questions in Response to COVID-19**

**Q) Can CCDF Lead Agencies continue to pay providers, if child care programs close and/or parents keep their children home due to COVID-19?**

**Q) Can a Lead Agency use CCDF to pay for child care for children who are not currently CCDF-eligible, and if so under what circumstances?**

**Q) If COVID-19 results in increased child care demand (e.g., all schools close down and parents still need to work during the day), can the Lead Agency enroll temporary unlicensed care providers to serve additional children?**

## FAQs, cont.

**Q) If a parent stops working or works fewer hours due to circumstances related to COVID-19 (e.g., voluntary or mandatory quarantine), how does that impact their eligibility for CCDF subsidy?**

**Q) What flexibilities do Lead Agencies have to adjust families' co-payments if they are affected by COVID-19 job loss?**

# Questions



# CORONAVIRUS.GOV

- When you go to coronavirus.gov , you are immediately at <https://www.cdc.gov/coronavirus/2019-ncov/index.html> Half way down the home page click on “schools and child care” This brings you to <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/index.html> “Guidance for School Settings” which has good general information
- There is a text box on the right side of the page. Click on the bottom of the text box “Get detailed guidance ”This brings you to <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/guidance-for-schools.html>
- This is a “Interim Guidance for Administrators of US K-12 Schools and Childcare Programs” The information on this page is very detailed and provides specific guidance based on the amount of community transmission in the community and whether a COVID 19 positive child has been in the program.

# Further Information

- Measures to prevent COVID-19 In your Community, including at home, in childcare settings and schools, homeless centers, at work and in faith-based settings:
- Information for higher-risk and special populations:  
<https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/index.html>
- Related specifically to domestic and international travel:  
<https://www.cdc.gov/coronavirus/2019-ncov/travelers/index.html>
- General Frequently Ask Questions including, How is Spreads, Symptoms, and what to do if you are sick:  
<https://www.cdc.gov/coronavirus/2019-ncov/faq.html>